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February 20, 1996

General Counsel Office  
Federal Election Commission  
999 E Street, N.W.  
Washington, D.C. 20463  
Attn: Dawn Odrowski

RECEIVED  
FEDERAL ELECTION  
COMMISSION  
OFFICE OF GENERAL  
COUNSEL  
FEB 21 1 44 PM '96

Re: MUR 3774 - American Defense Foundation, Inc.

Dear Ms. Odrowski:

I am writing in response to your letter of February 2, 1996 requesting clarification with regards to the American Defense Foundation's responses to the Commission's earlier questions and request for documents. To facilitate our responses, I have reproduced your questions, followed by the Foundation's responses.

Additional documents will be provided to your office tomorrow, February 21, 1996.

If you should have any additional questions regarding our responses, please do not hesitate to contact me.

Sincerely yours,



E. Mark Braden

EMB/rvn

Enclosures

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Your response to **Question 1** identified individuals who have knowledge of the Military Voter Program ("MVP") rather than individuals who have knowledge of the payment of funds to the American Defense Foundation, Inc. ("ADF") from the National Republican Senatorial Committee ("NRSC"). Please state whether each of the individuals identified in your response has knowledge of the payment of funds to ADF from the NRSC and, as requested, identify all others who have knowledge of NRSC's payments.

Question 1 - Each of the individuals identified in our previous response has knowledge of the payment of funds to ADF from the NRSC. No others have such knowledge.

In response to **Question 2c**, you state that Respondent cannot furnish exact dates on which specific oral communications may have occurred. As an initial matter, please note that "communication" encompasses both oral and written contacts. Accordingly, please review your response and supplement it, if appropriate. Moreover, documents produced by your client indicate that meetings took place between at least one ADF employee, Mike McDaniel, and NRSC representatives on February 25, 1992; June 29, 1992; September 1, 1992; October 2, 1992 and May 14, 1993. Please provide all documents related to these and any other meetings, including but not limited to any diary, calendar, date planner or other similar record maintained by Mr. McDaniel or other ADF or ADI attendees and any correspondence, phone records or fax logs containing or evidencing communications related to such meetings. Also as requested, identify the person(s) who initiated such communication(s).

Red McDaniel, Mike McDaniel or John Isaf initiated such communications. All documents have been provided with earlier response.

With regard to your response to **Question 2e**, please clarify whether all four payments were used exclusively to fund the Military Voter Program. if not, state how the remainder of the payments were used and provide all related documents.

All records pertaining to Military Voter Program direct expenses have already been provided. The remainder of the funds were used for other ADF/ADI expenses, as stated in the audit already provided.

In response to **Question 2f** (re: information provided by ADF to NRSC regarding the use of the payments), you state that no records of specific communications could be located. Please provide documents evidencing any general communications such as diaries, calendars or date planners, phone records or fax logs. Moreover, in accordance with the subpoena instructions, please explain what was done to secure this information.

All available records pertaining to information provided by ADF to NRSC regarding the use of payments have already been provided. All Military Voter Program files, correspondence files, and financial files were carefully examined; all staff personnel were questioned.

We note that several of the ADI bank statements produced in response to **Question 3** were incomplete. With regard to ADI's Riggs Bank account No. 76-110-679, please produce a copy of ADI's September 9/93 bank statement. With respect to ADI's Riggs Bank Account No. 08-587-096, please produce copies of the following: p. 3 of ADI's 1/92, 2/92, 6/92 and 7/92 statements; pages 2 and 3 of ADI's 3/92 statement (our copy of p.2 is cut off); pages 2 and 3 of ADI's 12/92 statement; and p.1 of ADI's 9/93 statement. Additionally, as requested, please produce copies of both the check and corresponding check stub for each check or check stub produced in response to **Questions 3 and 5**.

Question 3 - attached:

Riggs account #76-110-679 9/93 statement.

Riggs account #08-587-096 12/92 statement pp.2-3

Riggs account #08-587-096 statement p.2

There is no page 3 for Riggs account #08-587-096 for 3/92; 1/92; 6/92 and 7/92.

All checks and corresponding check stubs have already been provided, but will again be submitted separately.

A copy of the attached letter referencing the 1992 U.S. Senate runoff election in Georgia (Attachment 1) was produced in response to **Question 5**. Please clarify whether this letter was mailed or otherwise distributed by or on behalf of ADI, Inc. in connection with the runoff election. If so, produce all documents related to such distribution or mailing or affirm that none exists.

The letter referencing the 1992 U. S. Senate runoff election in Georgia provided in response to question 5 (Attachment 1 in the FEC reply) was mailed to approximately 30,000 military personnel who are registered to vote in Georgia. No documents related to this mailing exist other than those already provided.

Documents produced in response to **Question 6** indicate that ADF or ADI obtained copies of certain video and audio tapes of appearances made by Captain McDaniel in connection with the 1992 U.S. Senate runoff election in Georgia. Please produce the videotape (dub) of WMAZ's November 19, 1992 interview with Captain McDaniel and the 11/19/92 tape of the McDaniel interview purchased from WGXA on 11/25/92 (Check No. 4211).

The audio and video tapes requested cannot be located. All the files have been searched.



Copies of the 1992 and 1993 Form 990s produced in response to **Question 7** appear to be incomplete. Please produce all Schedules attached to the Form 990s filed by ADF for 1992 and 1993 and ADI for 1992. Also produce any amended Form 990s filed by ADF or ADI for 1992 and 1993.

Additional complete 990s will be provided in a separate package.

Documents provided in response to **Question 10d** indicate that Lisa C. Lindquist and Wes Anderson assisted in various tasks relating to 1992 and 1993 GOTV activity. Please identify them.

Lisa C. Linquist is no longer employed by the American Defense Foundation. Ms. Linquist performed computer data related tasks and fundraising. She had minimal contact with the Military Voter Program.

Wes Anderson was an intern and performed principally menial tasks for the American Defense Foundation staff. He lives presently in the Washington Metropolitan area. Task relating to the Military Voter Program would have been principally clerical in nature. He is not now with the Foundation.